

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

**[PROPOSED] ORDER TO SHOW CAUSE  
WHY PLAINTIFFS IN EXHIBIT A1 WHO  
HAVE SUBMITTED NON-BONA FIDE RIDE  
RECEIPTS SHOULD NOT BE DISMISSED  
WITH PREJUDICE**

This Document Relates to:  
  
ALL ACTIONS

Having considered Uber's Motion for Entry of an Order to Show Cause Why 6 Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed with Prejudice, the Court hereby GRANTS the motion.

The Court's Pretrial Order No. 5 required Plaintiffs to provide "a bona fide ride receipt from an Uber trip connected to the alleged incident[.]" ECF 175, ¶ 4.

The 6 Plaintiffs listed in Exhibit A1 of the Motion have submitted non-bona fide receipts.

The Ninth Circuit has recognized that dismissal of claims is warranted under Federal Rule of Civil Procedure 37 where a party "willfully, deliberately, and intentionally submitted false documents to support apparently untenable claims and defenses." *Pro. Seminar Consultants, Inc. v. Sino Am. Tech. Exch. Council, Inc.*, 727 F.2d 1470, 1472, 1474 (9th Cir. 1984). Courts may also impose sanctions as part of their "inherent power to control their dockets," including their "inherent power to dismiss an action when a party has willfully deceived the court[.]" *Thompson v. Hous. Auth. of City of Los Angeles*, 782 F.2d 829, 831 (9th Cir. 1986); *Wyle v. R.J. Reynolds Indus., Inc.*, 709 F.2d 585, 589 (9th Cir. 1983).

Accordingly, the 6 Plaintiffs listed in Exhibit A1 are hereby ORDERED TO SHOW CAUSE why their claims should not be dismissed with prejudice. The Plaintiffs shall file a written response no later than [\_\_\_\_]. The response must specifically address the factual and legal basis for the submission of the non-bona fide receipts and why the conduct does not warrant dismissal under the Court's inherent powers.

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1 The Court orders Plaintiffs with MDL IDs 3698, 3700, 3879, 4142, and 4243 to submit within 30  
2 days to a deposition not to exceed 3 hours regarding how the Plaintiffs became involved in the litigation,  
3 how the fraudulent receipts were generated and distributed (including in coordination with a non-party),  
4 and who else was involved in or aware of the fraud described in Uber's above referenced Motion.

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8 **IT IS SO ORDERED.**

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10 Dated: \_\_\_\_\_, 2026

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11 HON. CHARLES R. BREYER  
12 United States District Court Judge  
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# EXHIBIT A1

MDL ID	Law Firm
3698	Pulaski Law Firm, PLLC
3700	Pulaski Law Firm, PLLC
3879	Reich and Binstock, LLP
4097	Wagstaff Law Firm
4142	Reich and Binstock, LLP
4385	Wagstaff Law Firm